

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DAVID PORTER  
1548 E. Walnut Lane  
Philadelphia, PA 19138

*Plaintiff,*

v.

UNIVERSITY OF PENNSYLVANIA  
HEALTH SYSTEM  
1500 Market Street  
West Tower, Centre Square  
Philadelphia, PA 19102  
and  
THE TRUSTEES OF THE UNIVERSITY  
OF PENNSYLVANIA d/b/a  
Penn Medicine  
3400 Civic Center Blvd.  
Philadelphia, PA 19104  
and  
HOSPITAL OF THE UNIVERSITY OF  
PENNSYLVANIA  
3400 Spruce Street  
Philadelphia, PA 19104

*Defendants.*

CIVIL ACTION

No.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**CIVIL ACTION COMPLAINT**

Plaintiff, David Porter, by and through his undersigned counsel, hereby avers as follows:

**I. INTRODUCTION**

1. Plaintiff has initiated this action to redress violations by University of Pennsylvania Health System, The Trustees of the University of Pennsylvania d/b/a Penn Medicine and the Hospital of the University of Pennsylvania (“Defendants,” if referred to collectively) of Section 1981 of the Civil Rights Act of 1866 (“Section 1981” – 42 U.S.C. §

1981), Title VII of the Civil Rights Act of 1964 (“Title VII” – 42 U.S.C. §§ 200d *et seq.*) and the Philadelphia Fair Practice Ordinance (“PFPO”).<sup>1</sup> Plaintiff was unlawfully terminated by Defendants on two separate occasions and he suffered damages more fully described/sought herein.

## **II. JURISDICTION AND VENUE**

2. This Court, in accordance with 28 U.S.C. § 1331, has jurisdiction over Plaintiff’s claims because this civil action arises under laws of the United States.

3. This Court may properly maintain personal jurisdiction over Defendants because Defendants’ contacts with this state and this judicial district are sufficient for the exercise of jurisdiction over Defendants to comply with traditional notions of fair play and substantial justice, satisfying the standard set forth by the United States Supreme Court in *International Shoe Co. v. Washington*, 326 U.S. 310 (1945) and its progeny.

4. Pursuant to 28 U.S.C. § 1391(b)(1) and (b)(2), venue is properly laid in this district because all of the acts and/or omissions giving rise to the claims set forth herein occurred in this judicial district, and in addition, Defendants are deemed to reside where they are subject to personal jurisdiction, rendering Defendants residents of the Eastern District of Pennsylvania.

5. Plaintiff is proceeding herein (in part) under Title VII and has properly exhausted his administrative remedies with respect to such claims by timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) (and dual-filing with the PCHR) and by filing the instant lawsuit within ninety (90) days of receiving a notice of dismissal and/or right to sue letter from the EEOC.

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<sup>1</sup>Plaintiff intends to amend his instant lawsuit to include claims under the PFPO once his administrative remedies are fully exhausted with the Philadelphia Commission on Human Relations (“PCHR”).

### **III. PARTIES**

6. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

7. Plaintiff is an adult individual, with an address as set forth in the caption.

8. Defendant University of Pennsylvania Health System operates hospitals located in Philadelphia, PA.

9. Defendant The Trustees of the University of Pennsylvania d/b/a Penn Medicine is the parent organization which oversees and operates multiple hospitals in the greater Philadelphia area.

10. Defendant Hospital of the University of Pennsylvania (“HUP”) is the flagship hospital of Penn Medicine and is located in the University City section of West Philadelphia.

11. Upon information and belief, because of their interrelation of operations, common ownership or management, centralized control of labor relations, common ownership or financial controls, and other factors, Defendants are sufficiently interrelated and integrated in their activities, labor relations, ownership and management that they may be treated as Plaintiff’s single, integrated, and/or joint employer for purposes of the instant action.

12. At all times relevant herein, Defendants acted by and through their agents, servants and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for Defendants.

### **IV. FACTUAL BACKGROUND**

13. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

14. Plaintiff is a black (African-American) male.

15. Plaintiff became employed with Defendants effective on or about July 20, 2020.

16. Plaintiff was employed by Defendants as a Security Guard at 3400 Spruce Street, Philadelphia, PA 19104 (for Defendants' operations doing business publicly as "Penn Medicine").

17. Plaintiff is an exceptionally hard worker, and he did a stellar job during his employment with Defendants.

18. While in the employ of Defendants, Plaintiff was supervised, by *inter alia*, Chris O'Keefe (Caucasian), a Training and Compliance Coordinator (and supervisor) for Defendants, as well as O'Keefe's supervisor, Joe Forte (Caucasian), the HUP Security Director.

19. O'Keefe appeared to Plaintiff to be more flexible with non-black staff, and very rigid or pressuring with black staff (and minorities). O'Keefe was also more polite, professional, and pleasant with non-black (and non-minority) staff (and, from what Plaintiff discerned, more heavy-handed with discipline towards minorities).

20. In the December of 2022 timeframe, Plaintiff complained to O'Keefe that Plaintiff felt that O'Keefe was "treating [Plaintiff] unfairly racially." O'Keefe demanded that Plaintiff work overtime to cover shifts, but he was not giving Plaintiff reasonable notice.

21. Plaintiff is a team player and he did not mind helping, however, he would at times be directed to work overtime (with an unexpected second shift the same day) on the same day that he was already working (despite a prior schedule and personal obligations).

22. In response to Plaintiff's complaint of racial concerns, O'Keefe claimed that he was tough on everyone, not just Plaintiff. But Plaintiff's observations were different. It appeared to Plaintiff that O'Keefe exhibited selective harsher treatment towards minorities.

23. In the January-February of 2023 timeframe, and again in the spring of 2023 (in the April-May 2023 timeframe), Plaintiff raised his second and third concerns of discrimination known to O’Keefe, respectively.

24. In response, O’Keefe threatened Plaintiff’s job, if Plaintiff would not or could not work overtime without adequate notice, and was difficult or abusive in other ways.

25. For example, Plaintiff was told that it was an order or directive that he was required to work an overtime shift on the same day that Plaintiff was working his regularly scheduled shift. Again, while Plaintiff tried to help at times, sometimes Plaintiff could not work such an overtime shift with less than 24 hours’ notice due to numerous personal commitments.

26. While Plaintiff does not recall the exact dates, in the January-February and (separately in the) April-May of 2023 timeframe, Plaintiff again raised concerns that O’Keefe was singling Plaintiff out “racially” and that Plaintiff was not being treated fairly.

27. Plaintiff further elaborated that it seemed like minorities were being treated more harshly and/or were being picked on. Plaintiff felt that O’Keefe was harsher with black (and minority) employees, and O’Keefe was threatening Plaintiff’s job for not complying with his last-minute requests.

28. By Plaintiff’s best estimate, from December of 2022 through May of 2023 (prior to Plaintiff’s first May 15, 2023 termination), Plaintiff had made at least three (3) complaints of being treated differently based upon race.

29. Within less than one (1) month of when Plaintiff expressed his third concern to O’Keefe of being mistreated “racially,” Plaintiff was terminated on or about May 15, 2023.

30. Defendants' purported stated basis for Plaintiff's termination was that he apparently had not stayed to work an unscheduled (last-minute required) overtime shift on or about May 6, 2023.

31. As a result of Plaintiff's (initial) termination from employment, Plaintiff complained to Defendants' human resources personnel and explained that he was terminated unfairly.

32. By late May of 2023, Defendants' human resources department agreed that Plaintiff was unfairly terminated and, to Plaintiff's knowledge, his disciplinary termination was rescinded.

33. Thereafter, Plaintiff was permitted to return to work. However, there was *tremendous hostility* from Defendants' management with respect to the manner in which Plaintiff was spoken to, scheduled and handled.

34. It was clear to Plaintiff that he was not wanted back by Defendants' management. Plaintiff was then again terminated on or about July 7, 2023 (roughly another month later).

35. As to Plaintiff's second termination from employment, Plaintiff was given no meaningful information about details initially.

36. However, Plaintiff subsequently learned that Defendants seemed to be claiming that Plaintiff allegedly "falsified" his patrol log which, according to Defendants' allegations, was purportedly sometime in June of 2023. Plaintiff also believes that Defendants claim that Plaintiff was working in the office at a time when he was listed as on patrol.

37. However, Plaintiff and the other Security Guards often went to the office between patrols, and Plaintiff always fulfilled his patrol requirements. Plaintiff cannot provide more specifics (even though he did nothing wrong) as to the complete pretext in Defendants' stated

reason for Plaintiff's second termination because: (a) Plaintiff never had a problem with his logs in three (3) years of employment; (b) it is clear Defendants only went back and checked Plaintiff's logs to find an excuse to terminate him (based upon Plaintiff's race and prior protected activities); (c) Plaintiff was not given any opportunity to look at, explain or hear any alleged concerns prior to his abrupt termination; and (d) Plaintiff is still unclear on specifics as to the alleged bases for his termination from employment.

38. There is simply no question that Plaintiff was terminated on two (2) separate occasions discriminatorily and retaliatorily for raising concerns of being treated unfairly "racially" on multiple occasions.

39. Plaintiff believes and therefore avers that he was subjected to a hostile work environment and terminated because of his race and/or complaints about race discrimination.

#### **COUNT I**

##### **Violations of 42 U.S.C. Section 1981**

**([1] Race Discrimination; [2] Retaliation; and [3] Hostile Work Environment)  
- Against All Defendants - Both Unlawful Terminations -**

40. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

41. During Plaintiff's employment with Defendants, he was subjected to discrimination and a hostile work environment through disparate and demeaning treatment, severe and/or pervasive harassment, selective enforcement of policies, and targeted for harassment because of his race.

42. Defendants took insufficient remedial action after being notified of same.

43. Plaintiff believes and therefore avers that he was terminated from his employment with Defendants, on both occasions, because of his race.

44. Plaintiff further believes and therefore avers that he was terminated from his employment with Defendants, on both occasions, because of his complaints about race discrimination.

45. These actions as aforesaid constitute unlawful discrimination, retaliation and a hostile work environment under Section 1981.

**COUNT II**  
**Violations of Title VII**  
**([1] Race Discrimination; [2] Retaliation; and [3] Hostile Work Environment)**  
**- Against All Defendants - Both Unlawful Terminations -**

46. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

47. During Plaintiff's employment with Defendants, he was subjected to discrimination and a hostile work environment through disparate and demeaning treatment, severe and/or pervasive harassment, selective enforcement of policies, and targeted for harassment because of his race.

48. Defendants took insufficient remedial action after being notified of same.

49. Plaintiff believes and therefore avers that he was terminated from his employment with Defendants, on both occasions, because of his race.

50. Plaintiff further believes and therefore avers that he was terminated from his employment with Defendants, on both occasions, because of his complaints about race discrimination.

51. These actions as aforesaid constitute unlawful discrimination, retaliation and a hostile work environment under Title VII.

**WHEREFORE**, Plaintiff prays that this Court enter an Order providing that:



A. Defendants are to promulgate and adhere to a policy prohibiting discrimination in the future against any employee(s);

B. Defendants are to compensate Plaintiff, reimburse Plaintiff, and make Plaintiff whole for any and all pay and benefits Plaintiff would have received had it not been for Defendants' illegal actions, including but not limited to back pay, front pay, salary, pay increases, bonuses, insurance, and benefits.

C. Plaintiff is to be awarded actual damages, as well as emotional distress damages for the pain, suffering, and humiliation caused by Defendants' actions;

D. Plaintiff is to be awarded punitive damages, as permitted by applicable law(s) alleged asserted herein, in an amount believed by the Court or trier of fact to be appropriate;

E. Plaintiff is to be accorded other equitable and legal relief as the Court deems just, proper, and appropriate;

F. Plaintiff is to be awarded the costs and expenses of this action and a reasonable attorneys' fees as provided by applicable federal and state law; and

G. Plaintiff is to be given a jury trial as demanded in the caption of this Complaint.

Respectfully submitted,

**KARPF, KARPF & CERUTTI, P.C.**



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Ari R. Karpf, Esquire  
3331 Street Road  
Two Greenwood Square, Suite 128  
Bensalem, PA 19020  
(215) 639-0801  
[akarpf@karpf-law.com](mailto:akarpf@karpf-law.com)  
*Attorneys for Plaintiff*

Date: February 12, 2024

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

David Porter

v.

CIVIL ACTION

NO.

University of Pennsylvania Health System, et al.


In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

2/12/2024

**Date**

  
**Attorney-at-law**

**Plaintiff**

**Attorney for**

(215) 639-0801

**Telephone**

(215) 639-4970

**FAX Number**

akarpf@karpf-law.com

**E-Mail Address**

**DESIGNATION FORM**

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 1548 E. Walnut Lane, Philadelphia, PA 19138

Address of Defendant: 1500 Market St, West Tower, Centre Sq, Phila, PA 19102; 3400 Civic Center Blvd, Phila, PA 19104; 3400 Spruce St, Phila, PA 19104

Place of Accident, Incident or Transaction: Defendants place of business

**RELATED CASE, IF ANY:**

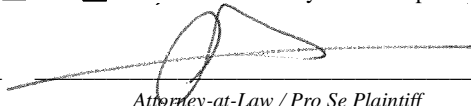
Case Number: Judge: Date Terminated:

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 2/12/2024

  
Attorney-at-Law / Pro Se Plaintiff

ARK2484 / 91538

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | 1. Indemnity Contract, Marine Contract, and All Other Contracts |
| <input type="checkbox"/>            | 2. FELA   |
| <input type="checkbox"/>            | 3. Jones Act-Personal Injury                                    |
| <input type="checkbox"/>            | 4. Antitrust  |
| <input type="checkbox"/>            | 5. Patent   |
| <input type="checkbox"/>            | 6. Labor-Management Relations                                   |
| <input checked="" type="checkbox"/> | 7. Civil Rights   |
| <input type="checkbox"/>            | 8. Habeas Corpus  |
| <input type="checkbox"/>            | 9. Securities Act(s) Cases                                      |
| <input type="checkbox"/>            | 10. Social Security Review Cases                                |
| <input type="checkbox"/>            | 11. All other Federal Question Cases                            |
- (Please specify):

**B. Diversity Jurisdiction Cases:**

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | 1. Insurance Contract and Other Contracts  |
| <input type="checkbox"/> | 2. Airplane Personal Injury                |
| <input type="checkbox"/> | 3. Assault, Defamation                     |
| <input type="checkbox"/> | 4. Marine Personal Injury                  |
| <input type="checkbox"/> | 5. Motor Vehicle Personal Injury           |
| <input type="checkbox"/> | 6. Other Personal Injury (Please specify): |
| <input type="checkbox"/> | 7. Products Liability                      |
| <input type="checkbox"/> | 8. Products Liability – Asbestos           |
| <input type="checkbox"/> | 9. All other Diversity Cases               |
- (Please specify):

**ARBITRATION CERTIFICATION**

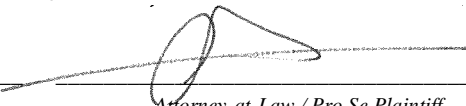
(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Ari R. Karpf, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 2/12/2024

  
Attorney-at-Law / Pro Se Plaintiff

ARK2484 / 91538

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

PORTER, DAVID

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Karpf, Karpf & Cerutti, P.C.; 3331 Street Road, Two Greenwood Square,  
Suite 128, Bensalem, PA 19020; (215) 639-0801; akarpf@karpf-law.com

**DEFENDANTS**

UNIVERSITY OF PENNSYLVANIA HEALTH SYSTEM, ET AL.

County of Residence of First Listed Defendant Philadelphia  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
Title VII (42USC2000); Section 1981 (42USC1981)

Brief description of cause:

Violations of Title VII, Section 1981 and the PFPO.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION DEMAND \$  
UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

2/12/2024

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

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